

10cv8451

RECEIVED
CLERK OF COURT
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
JAMIE A. NAUGHRIGHT, PM 4:06

Plaintiff,

v.

DONNA KARAN WEISS,
URBAN ZEN, LLC,
STEPHEN M. ROBBINS, and
JOHN DOES 1-25,

Defendants.

USDC SDNY DOCUMENT ELECTRONICALLY FILED Case No. 10-Cv-8451(RWS)(HP) DOC #: DATE FILED: 12/9/11
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AMENDED COMPLAINT

COMES NOW the Plaintiff, JAMIE ANN NAUGHRIGHT, appearing pro se, and files her Amended Complaint against the Defendants, DONNA KARAN WEISS, URBAN ZEN, LLC, and STEPHEN M. ROBBINS, and says:

I. JURISDICTION

1. This is an action for damages that exceed \$75,000.00, exclusive of interest and costs, between citizens of different states. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. §1332(a)(1).

II. VENUE

2. Venue is appropriate in the Southern District Court of the State of New York because the majority of the actions and omissions giving rise to Plaintiff's claims occurred within the southern district of New York.

III. PARTIES

3. Plaintiff JAMIE ANN NAUGHRIGHT is a citizen of the United States who is a resident of and is domiciled in Florida. She resides at 1627 Sherwood Lakes Boulevard, Lakeland, Florida.

4. Defendant DONNA KARAN WEISS is a citizen of the United States who is a resident of and is domiciled in New York. She resides at 55 Central Park West, New York, New York.

5. Defendant URBAN ZEN, LLC, ("URBAN ZEN") is a New York limited liability company registered to do business in the State of New York. Its principal place of business is at 570 Seventh Ave., Suite 703, New York New York. Defendant KARAN WEISS is a managing member, principal and guiding force in the business of URBAN ZEN.

6. Defendant STEPHEN M. ROBBINS is a citizen of the United States who is a resident of and is domiciled in California. His residence address is 137 N. Larchmont Boulevard, Los Angeles, California.

7. Defendant JOHN DOES 1-25 are fictitious defendants to name potentially responsible persons whose identity can only be ascertained through discovery.

IV. COMMON FACTUAL ALLEGATIONS

8. At all material times, KARAN WEISS controlled premises with the street address of 55 Central Park West in New York City, New York County, State of New York, which she utilized, at least on the date of November 8, 2009, for a mixed purpose, including as a location to promote, advance, accomplish and conduct the business of URBAN ZEN.

9. KARAN WEISS, personally or through URBAN ZEN, or both, contracted with ROBBINS (or with an organization he controlled) to provide "healing services" to individuals identified by KARAN WEISS and URBAN ZEN as market leaders and decisionmakers as part of a marketing strategy in the hope and expectation that it would inure to the benefit of URBAN ZEN.

10. From 2007 through 2010, NAUGHRIGHT was under contract with URBAN ZEN to serve as director of its Urban Zen Integrative Therapist program ("UZIT"). NAUGHRIGHT was contracted to develop and implement curriculum that could achieve national accreditation status using four modalities, one of which was yoga. Accreditation would require working with licensed physicians who believed in and worked at the integration of western medicine and eastern health care. KARAN WEISS and her co-venturers in URBAN ZEN intended to profit by creating and implementing an accredited protocol they would own under the Urban Zen brand. NAUGHRIGHT was to develop that protocol.

11. The program that NAUGHRIGHT created was patterned on accredited health care education formats. The curriculum required affiliation with a reputable medical institution, which KARAN WEISS and her co-venturers in URBAN ZEN, achieved with Beth Israel Medical Center. It required affiliation with reputable physicians, which KARAN WEISS and URBAN ZEN, achieved with Woodson Merrell, M.D. and Susan Bressman, M.D., and which they attempted to achieve with Mehmet Oz, M.D. and Dean Ornish, M.D.

12. While NAUGHRIGHT developed the curriculum, her role did not include selecting and screening the physician candidates for affiliation with UZIT. KARAN WEISS and URBAN ZEN reserved to themselves the task of selecting and screening the physician candidates who would be affiliated with UZIT. KARAN WEISS knew or should have known about ROBBINS' lack of credentials. She blogged about her involvement in health care reform, had made public presentations on the integration of western and eastern healthcare, and had abundant resources and personnel who investigated individuals to recruit for the UZIT program.

13. In 2009, KARAN WEISS and URBAN ZEN decided to host a promotional/educational event for UZIT, which they called the "New York Healing Weekend." It would take place on November 7 and 8, 2009. Some of the several events on the agenda were to take place at Stephan Weiss Studios and some of the events were to take place at KARAN WEISS's apartment at 55 Central Park West. A copy of the weekend schedule as well as promotional material used at that event is attached as Composite Exhibit "A."

14. Late in October 2009, KARAN WEISS informed NAUGHRIGHT that she had been treated in California by an amazing healer and that she wanted him brought into the UZIT program and incorporated into the New York Healing Weekend. KARAN WEISS and Rachel Goldstein, of URBAN ZEN, described ROBBINS as a "great healer" from California who was associated with medical schools at UCLA and USC. By their statements and conduct, described in more detail below, KARAN WEISS and URBAN ZEN led NAUGHRIGHT to believe that ROBBINS was a licensed physician who, like the licensed doctors already affiliated with the UZIT program, promoted the idea that western medicine can be improved and accentuated by integrating it with eastern treatment philosophy. KARAN WEISS and persons acting at her direction led NAUGHRIGHT to believe that Robbins could be a contributor to the UZIT program, which program required licensure.

15. In fact, ROBBINS was not a licensed physician or health care provider. He has not held a medical license in several years.

16. KARAN WEISS knew that NAUGHRIGHT, because of her role as the developer of the curriculum in which licensure of health care providers was required, would have objected to ROBBINS' participation in the promotional weekend event had she known that ROBBINS was unlicensed. KARAN WEISS and others who were acting for URBAN ZEN

intentionally led NAUGHRIGHT to believe that ROBBINS was credentialed for the purpose of receiving NAUGHRIGHT's cooperation with the promotional weekend events in which ROBBINS was participating.

17. In fact, KARAN WEISS did not care whether or not ROBBINS was licensed and wanted to keep his lack of licensure from NAUGHRIGHT. It was a pattern of KARAN WEISS's conduct of which NAUGHRIGHT was not aware at the time, but which she learned later via email from KARAN WEISS's attorney, David Bressman. A copy of that November 12, 2009, email is attached hereto and identified as Exhibit "B." KARAN WEISS's indifference to the well-being of those who rely on her continues to use and promote ROBBINS. Despite Mr. Bressman's concerns, KARAN WEISS and URBAN ZEN continued to invite ROBBINS to events.

18. KARAN WEISS invited ROBBINS to the UZIT event and directed URBAN ZEN staff to incorporate ROBBINS' work and lecture into the New York Healing Weekend event on November 7 and 8, 2009. When the time came for the event, KARAN WEISS and others acting at her direction instructed and directed NAUGHRIGHT to attend and participate. KARAN WEISS expected NAUGHRIGHT to help make the event successful in promoting the UZIT program by participating in the events.

19. On November 6, 2009, KARAN WEISS invited ROBBINS to attend a VIP event for the UZIT program and continued to promote him as a healer who was affiliated with medical schools and qualified to be involved in the UZIT program. KARAN WEISS invited other physicians to the event and intended for many of them to actually undergo treatment by ROBBINS. That fact further underscored NAUGHRIGHT's belief that ROBBINS was qualified to participate in the UZIT program.

20. On November 7, 2009, NAUGHRIGHT complied with KARAN WEISS's instruction to attend the event, attend a lunch with ROBBINS, UZIT administrators, staff, and faculty, and listen to a lecture by ROBBINS. During ROBBINS' lecture to a few dozen of attendees, including NAUGHRIGHT, ROBBINS stated that he was associated with UCLA Medical Center and USC Medical Center and that he provided services to the Los Angeles Police Department.

21. During the November 7, 2009 presentation by ROBBINS to the UZIT students and Urban Zen staff, as well as NAUGHRIGHT, KARAN WEISS and other senior URBAN ZEN staff said publicly that ROBBINS was, or soon would be, affiliated with Beth Israel Medical Center in New York City.

22. Because she relied on KARAN WEISS to select and screen the health care providers who would fulfill the criteria for accreditation, NAUGHRIGHT did not question ROBBINS' legitimacy as a physician.

23. As part of NAUGHRIGHT's duties under the contract with KARAN WEISS and URBAN ZEN, on November 8, 2009, she went to KARAN WEISS's apartment where some of the New York Healing Weekend events were taking place.

24. As required, NAUGHRIGHT went to KARAN WEISS's apartment and, upon arrival, was informed by URBAN ZEN staffer, Rachel Goldstein, that ROBBINS' treatment sessions were behind schedule. NAUGHRIGHT made the decision to return back to Stephan Weiss Studios to continue her participation in the events there. While in route, Ms. Goldstein telephoned NAUGHRIGHT and stated that KARAN WEISS wanted NAUGHRIGHT to return to the apartment. NAUGHRIGHT refused and continued on to Stephan Weiss Studios. Upon arriving back at Stephan Weiss Studios, NAUGHRIGHT received a telephone call from KARAN

WEISS who insisted that NAUGHRIGHT return back to KARAN WEISS's apartment immediately to be treated by ROBBINS. Fearful of being seen as insubordinate, NAUGHRIGHT returned to KARAN WEISS's apartment.

25. When NAUGHRIGHT arrived, KARAN WEISS came out of a bedroom and greeted NAUGHRIGHT and raved about what a phenomenal and outstanding healer ROBBINS was and said that NAUGHRIGHT had to be treated by him. KARAN WEISS led NAUGHRIGHT into her bedroom where a massage table was set up. Then she left the room and NAUGHRIGHT was alone with ROBBINS and his wife. ROBBINS and NAUGHRIGHT spoke briefly then ROBBINS instructed her to lie on the massage table.

26. Robbins did not ask for any medical background from NAUGHRIGHT and did not seek consent. No consent forms or waiver forms were provided, which were usually required by KARAN WEISS's attorney. NAUGHRIGHT expected healing touch or Reiki as well as verbal feedback on her structural alignment.

27. Instead, without warning, ROBBINS applied traction to NAUGHRIGHT's neck, followed by violent shaking of her head repeatedly from side to side. He then held her forehead down and pulled on her jaw. He forced his ungloved hand adorned by a large ring inside NAUGHRIGHT's mouth and then violently shook her head. He undertook these actions without warning or obtaining consent from her. While his hand was in NAUGHRIGHT's mouth, ROBBINS told her that she needed to "let go" because she had control issues. After that, he offered to massage her breasts and declared that the left one was dead. ROBBINS suggested that NAUGHRIGHT needed a "vagina release" procedure. She refused these additional "treatments."

28. ROBBINS' "treatment" caused serious and permanent injury to NAUGHRIGHT. He ruptured a cervical disk in her neck causing multiple bulging discs, stenosis and a mid-thoracic herniated disc, fractured and dislocated her jaw causing damage to her hearing and balance. He caused a spinal fusion which has required a bone graft in her neck. NAUGHRIGHT has had to undergo surgeries and many diagnostic procedures including MRI, CT scans, nuclear medicine tests, and myelogram. She has been diagnosed with thoracic outlet syndrome and double crush syndrome/injury. NAUGHRIGHT has experienced debilitating pain as a result of these injuries. She was unable to drive a car for more than a year and was unable to perform the simple tasks of daily living. She was rendered unable to return to employment. The pain was of such severity that heart monitoring also was required. Though NAUGHRIGHT has regained some function, she is physically unable to pursue her profession as an athletic trainer and continues to have debilitating pain and discomfort. NAUGHRIGHT will need surgeries in the future as a result of ROBBINS' attempt to lengthen and lift her spine. If surgery occurs on the thoracic herniated disc, it will require ribs to be broken and her lung to be displaced, requiring an 18-month recovery period. Pain management physicians are reluctant to perform pain management injections at the site. Therefore, Dr. NAUGHRIGHT is in constant pain, requiring weekly physical and massage therapy. Dr. Larry Padgett has determined that the delay in surgery needed on NAUGHRIGHT's knee has caused irreversible damage to her knee and possibly requiring total knee replacement in the future.

COUNT I

Negligent misrepresentation by KARAN WEISS and URBAN ZEN, LLC

29. This is an action for damages against KARAN WEISS and URBAN ZEN for negligent misrepresentation.

30. The allegations of paragraphs 1 through 28 are realleged herein as if set forth fully.

31. In her position as director of UZIT, NAUGHRIGHT was under contract with URBAN ZEN, an entity primarily established, run and promoted by KARAN WEISS. Along with others at UZIT, KARAN WEISS directly supervised NAUGHRIGHT's performance under the contract.

32. With respect to the UZIT program, KARAN WEISS occupied a special position of confidence and trust with NAUGHRIGHT, as well as authority over her, such that NAUGHRIGHT'S reliance on the representations of KARAN WEISS regarding ROBBINS' qualifications to treat her was justified.

33. As a result of that special relationship, KARAN WEISS owed NAUGHRIGHT a duty of care not to carelessly impart information to her about ROBBINS' qualifications.

34. KARAN WEISS made a false representation to NAUGHRIGHT that KARAN WEISS should have known was incorrect. The false representation that KARAN WEISS made to NAUGHRIGHT was that ROBBINS was qualified in either California or New York to provide medical treatment to NAUGHRIGHT.

35. KARAN WEISS knew or should have known the information was incorrect because she was in the position of recruiting qualified physicians as part of her duties to URBAN ZEN.

36. KARAN WEISS knew that NAUGHRIGHT desired accurate information about ROBBINS for the serious purposes of furthering the accreditation of UZIT and, on November 8, 2009, for her own safety.

37. KARAN WEISS intended that NAUGHRIGHT would rely on the representation concerning ROBBINS' qualifications because she knew that NAUGHRIGHT would object to having an unlicensed person presenting at the UZIT event on November 7 and 8, 2009. She also intended that NAUGHRIGHT trust her in finding a great healer to treat NAUGHRIGHT and, the other UZIT participants.

38. NAUGHRIGHT reasonably relied on KARAN WEISS's false representation concerning ROBBINS' qualifications when she received "treatment" from him, to her detriment.

39. Had NAUGHRIGHT known the truth about ROBBINS' qualifications, she would not have allowed him to touch her. Had NAUGHRIGHT known the truth about what ROBBINS intended to do to her, she would not have allowed him to touch her.

40. In fact, ROBBINS was not licensed in either California or New York and was not qualified to perform any medical or chiropractic procedure on NAUGHRIGHT on November 8, 2009.

41. NAUGHRIGHT has experienced mental and physical injury and pain and suffering, both temporary and permanent, as a proximate result of the negligent misrepresentation by KARAN WEISS and URBAN ZEN. As a proximate result of the negligent misrepresentation by URBAN ZEN and KARAN WEISS, NAUGHRIGHT no longer is able to be employed.

WHEREFORE, the Plaintiff, JAMIE ANN NAUGHRIGHT demands judgment against the defendants DONNA KARAN WEISS and URBAN ZEN, LLC, for compensatory damages, special damages, economic damages, and all other and further relief as the Court deems just and proper under the circumstances.

COUNT II

Negligence by ROBBINS

42. This is an action for negligence against defendant STEPHEN M. ROBBINS.

43. The allegations of paragraphs I through 28 are realleged as if set forth fully.

44. ROBBINS owed NAUGHRIGHT the duty to use reasonable care when he touched her on November 8, 2009.

45. ROBBINS breached the duty of reasonable care when he took the actions that he took while touching NAUGHRIGHT on November 8, 2009.

46. As a proximate result of ROBBINS' breach of his duty of reasonable care, NAUGHRIGHT suffered injury, both permanent and temporary.

WHEREFORE, the Plaintiff, JAMIE ANN NAUGHRIGHT, demands judgment against defendant STEPHEN M. ROBBINS for general and special damages, economic and non-economic damages, and all other and further relief as the Court deems just and proper under the circumstances.

COUNT III

Fraud by ROBBINS

47. This is an action for fraud against defendant STEPHEN M. ROBBINS.

48. The allegations of paragraphs I through 28, above, are realleged and as if set forth fully.

49. In his presentation on November 7, 2009, ROBBINS falsely represented that he was affiliated with UCLA and USC Medical Centers and that he could cure NAUGHRIGHT.

50. ROBBINS falsely represented that he was affiliated as a medical doctor with the Los Angeles Police Department.

51. ROBBINS knew that the representations were false at the time that he made them.

52. NAUGHRIGHT justifiably relied on the representations of ROBBINS concerning his medical credentials and qualifications.

53. NAUGHRIGHT was injured as a result of her reliance on the false representations of ROBBINS.

WHEREFORE, Plaintiff JAMIE ANN NAUGHRIGHT, demands judgment against defendant STEPHEN M. ROBBINS for general and special damages, economic and non-economic, and all other and further relief as the Court deems just and proper under the circumstances.

COUNT IV

Medical Malpractice by ROBBINS

54. This is an action for medical malpractice against defendant STEPHEN M. ROBBINS.

55. The allegations of paragraphs I through 28 are realleged as if set forth fully.

56. ROBBINS held himself out to be a medical professional credentialed to do business in the medical field in the State of California.

57. In fact, ROBBINS was not a qualified, licensed medical professional in any jurisdiction. Nonetheless, ROBBINS performed chiropractic manipulations on NAUGHRIGHT in New York City, New York on November 8, 2009.

58. ROBBINS had a duty to perform services in accordance with the standard of care in the community for the services rendered.

59. ROBBINS failed to meet the professional standards of skill and care prevailing among those who offer treatment lawfully in the State of New York.

60. The medical negligence of ROBBINS was the proximate cause of the injuries to NAUGHRIGHT.

61. Naughtright has suffered bodily injury, both temporary and permanently, pain and suffering and loss of income.

WHEREFORE, the Plaintiff, JAMIE ANN NAUGHRIGHT, demands judgment against the Defendant, STEPHEN M. ROBBINS, for general and special damages, economic and non-economic damages, and all other and further relief the Court deems just and proper under the circumstances.

COUNT V

Battery by ROBBINS

62. This is an action against STEPHEN M. ROBBINS for damages for battery on NAUGHRIGHT.

63. The allegations of paragraphs I through 28 are realleged and incorporated herein as if set forth fully.

64. ROBBINS failed to obtain NAUGHRIGHT's consent before thrusting his ungloved hand into her mouth and forcibly twisting and yanking her head.

65. ROBBINS did not warn NAUGHRIGHT of his intentions.

66. NAUGHRIGHT suffered damages as a proximate result of the battery by ROBBINS.

WHEREFORE, the Plaintiff demands judgment against ROBBINS for damages and all other and further relief as the Court deems just and proper under the circumstances.

COUNT VI

Failure to obtain consent by ROBBINS

67. This is an action against STEPHEN M. ROBBINS for damages for failure to obtain consent by NAUGHRIGHT to the touching.

68. The allegations of paragraphs I through 28 are realleged and incorporated herein as if set forth fully.

69. ROBBINS failed to warn NAUGHRIGHT of the treatment he was about to provide.

70. ROBBINS failed to disclose alternatives to the treatment he was about to provide.

71. ROBBINS failed to disclose the reasonably foreseeable risks and benefits of the treatment he was about to provide.

72. ROBBINS failed to make disclosures that a reasonable medical, dental or podiatric practitioner under similar circumstances would have made.

73. ROBBINS' omissions rendered NAUGHRIGHT unable to provide informed consent to any treatment by ROBBINS.

74. NAUGHRIGHT suffered damages as a result of ROBBINS' omissions.

WHEREFORE, NAUGHRIGHT demands judgment against ROBBINS for damages and all other and further relief as the Court deems just and proper under the circumstances.


Jamie Ann Naughtright
Pro se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Amended Complaint was furnished by email to Laura E. Rodgers, Esquire, Gordon & Silber, PC, 355 Lexington Ave., New York, NY 10017-6603, lrodgers@gordon-silber.com, and Howard S. Richman, Esquire, Grant Richman, PLLC, Liberty Building Rt. 9W, Stony Point, NY 10980, hrichtman@grantrichman.com, on the 3rd day of December, 2011.


Jamie Ann Naughtright
Pro Se

PRODUCTION OUTLINE

URBAN ZEN INTEGRATIVE THERAPIST

November 6-8, 2009

Theme: "Playing close attention to the details" Weekend
Evaluation of Students and Specific Conditions, Injuries,
and Illnesses

In Depth Reiki Review of Lower Extremity, How to interact
with the patient, and Professionalism

Clinical Rotation and Anatomy Break Out Group sessions

Stephan Weiss Studio

711 Greenwich Street

New York, NY 10014-1832

EXPECTED ATTENDANCE for Urban Zen Day: 90 UZITS and 5
faculty

Decembers training; YLEO Raindrop, Swap Restorative Topics
to Yogatherapy, Evaluation of Students, Evaluation of the
Program, and Commencement

THURSDAY, NOVEMBER 5TH

Set up by Volunteers

All Face sheets and spreadsheets

FRIDAY, NOVEMBER 6TH:

7 am Set up by Nicole and Lisa for students

7:30 am Door opens

AM Registration

8 - 9:15am Yoga Practice - RY/CSY All around practice
with emphases on self care, exploration, and
some special circumstances

9:15-9:30 am Announcements

9:30-9:45 am Break

9:45 -11:45 pm The Art of Sequencing do's and don'ts,
guidelines, anatomical emphases creating
symmetry and release of neurological holding
patterns and myofascial releases

11:45 - 12pm Q & A

12 - 2 pm Lunch

PM Registration

2 - 2:30 pm Restorative pose - RY/CSY for Infertility,
Pregnancy and Menopause

2:30 - 2:45 pm Q and A

2:45-3:30 pm Break out anatomy groups

3:30-3:45 pm Set up

3:45-4:00 pm Break

4-6 pm: Experience the UZIT Program: Special guests from a variety of backgrounds including potential sponsors, donors, partnerships, and clinical sites (approximately 30 individuals). Please see Joanne for guest lists. Joanne and Gabby will contact guests about dress. UZIT Poster, single oil, one dvd, and patient packet with bag (collateral, bag, eye bags, dvd/breath cd).

4-4:15 pm GATHERING OF GUESTS

Entering in the store (registration-30 confirmed, estimate 40 on the high end)

Escorted through Exhibition Area into SWS

40 Set ups of Restorative Poses with one UZIT working on another one. This will allow our guests to observe what they will be experiencing at 4:30 pm (a preview to encourage guest participation). Yee's will coordinate activity.

Escorted upstairs for fruit platters, nuts, and Jill Juices

4:15-4:30pm WELCOMING AND VIEWING OF THE VIDEO

Welcoming by DK and Yees. Overview of the basic program of the evening and the combination of practices/integration of the program by Jamie (upstairs)

Video-USA Today patient (ARAW: please get correct copy-audio/visual).

4:30-5 pm GROUP ACTIVITY

Bring guests downstairs

Entire group experience in SWS with 2 UZITS for each guest

5-6 pm

Purpose: 7 Segments

1. Demonstrate the integrative therapies in a hospital setting (in bed activity with Hill Rom hospital beds) with the in bed video showing (Lead by Shana)-Corner by side door 15 minutes
2. Demonstrate the integrative therapies for patients friends and love ones with **chair yoga** and the importance of self care 15 minutes
3. Demonstrate the integrative therapies in a variety of different settings with different professionals (Dentist) 5 minutes
4. Demonstrate the integrative therapies with health care providers self care (aromatherapy by Colleen /Reiki self care by Lena) 15 minutes
5. Provide different sessions with unique usability of these skills among different professionals for a variety of injuries, illnesses, and conditions by Jamie 5 minutes
6. Provide discussion on Nutrition and self care by Jamie 5 minutes
7. Provide discussion on Contemplative End of Life Care by Rodney, Colleen, and Jeff Brown 5 minutes

Provide q and a opportunities for possible clinical sites and donor capabilities at the end of each segment.

6-8 pm: Upstairs

- Presentation by Donna, Dr. Merrell, Rod/Col and Jamie with Q&A
- One Minute Testimonial from a couple of UZITs - Shana, Ed Dailey, Elaine from BIMC, Dr. Ron, Dr. Denny, and a few UZIT who are survivors or currently battling a condition, injury, illness (one important aspect they have observed of UZIT profound effect/efficacy and essential nature to the health care paradigm).
- Food and drink
- Have materials on site: UZIT poster

- Gift Bags

How Can I Help?

We are looking for **financial partners/sponsors** to enable us to do the next cycle of training and to continue and expand our work in the hospital

We'd love more **clinical sites** (hospitals)

We'd love additional **community service opportunities** for our Integrative Therapists (like a marathon, health forum, community in need, shelter relief, natural disaster relief)

We'd love opportunities to **present our program to audiences** of physicians, nurses and allied health care providers

If there are other **research projects** where our UZIT's or our program in general can be included, it would be wonderful

Share **research and appropriate materials** with our program management and students

We would welcome **product donations**

Introduce us to **policy makers** you know who need to hear about this program and its potential

Include the Urban Zen program in a **conference** you are producing/sponsoring/participating in

How Do I Get Involved

Become a **UZIT**

Talk to a hospital and see if you can introduce them to Urban Zen (so that they can become a **clinical site**)

Make a **donation to support scholarships students** in the program (UZIT)

Attend **Urban Zen Center** workshops, conferences and forums

Spread the word!

SATURDAY, NOVEMBER 7TH:

7 am Set up by Nicole and Lisa for students

7:30 am Door opens
AM Registration

8 - 9:15am Yoga Practice - RY/CSY All around practice with emphases on self care, exploration, and some special circumstances

9:15-9:30 am Announcements

9:30-9:45 am Break

9:45-11:45am Yogatherapy for Headaches, Heart Disease, and High Blood Pressure

11:45-12pm Q & A

12-2pm Lunch

PM Registration

2 - 2:30pm Restorative pose - RY/CSY for Arthritis, Carpal Tunnel Syndrome, and Back Care

2:30 - 3:30pm Special Guests with DK

3:30 - 4:30pm Evaluation by Rodney/Colleen Sessions

4:30 - 5:00pm Presentation by Dr. Ron Englert on Swine Flu

5:00 - 5:30pm Breakout into Clinical Rotations group
BIMC, Mt Sinai, Southampton, Monte Fiore
Children Hospitals,
Private practices, Other hospitals, and
Unique settings

5:30-5:50pm Summary and Discussions on Clinical Sites

5:50-6pm Q and A

SUNDAY, NOVEMBER 8TH:

7 am Set up by Nicole and Lisa for students

7:30 am Door opens
AM Registration

8 - 9:15am Yoga Practice - RY/CSY NEED THEME

9:15-9:30 am Announcements

9:30-9:45 am Break

9:45 -11:45 pm Yogatherapy for Chronic Fatigue Syndrome, Fibromyalgia, and Depression

11:45 - 12pm Q & A

12 - 1:30 pm Lunch

PM Registration

1:30 - 2:30pm Restorative pose - RY/CSY Irritable Bowel Syndrome, Diabetes, Depression, and Overweight and Obesity

2:30 - 3:00pm Break out in anatomy session and break if needed

3:00 - 5:00pm Reiki presentation and Q and A



DEIDRE HADE AND RABBI STEPHEN/EVA ROBBINS
New York City Healing Trip Schedule

CONTACT INFORMATION

DEIDRE HADE

310.720.7902 / deidrehade@yahoo.com

RABBI STEPHEN/EVA ROBBINS

323.528.7694 / 323.547.2286 // stephenmrobbins@gmail.com /
nvayshlm@hotmail.com

ANGEL EVANS

310.879.9946

PARTICIPANTS

Amanda De Cadenet	DK inviting	Deidre only
Annette Frehling	208.720.0315	
Colleen Saidman	631.379.9885	
Deb Jackman	DK inviting	
Gabby Karan DeFelice	DK inviting	
Gabrielle Roth	917.826.9641	
Gail Hoffman	516.626.8087	
Grace Deniro	DK inviting	
Ingrid Sischy + Sandy Brant	917.975.8682	
Jamie Naughtright	863.838.6035	
JJ Biasucci	917.804.2627	
Kelly Klein	917.912.0800	
Lisa Fox	917.224.1600	
Lisa Weiss	RPG	
Mara Landis	917.860.5901	
Rodney Yee	510.507.9604	
Sonja Nuttall	917.880.2632	(in Hawaii)
Susan Bressman	212.844.8379	(declined)
Woody Merrell	646.731.0120	

SATURDAY, NOVEMBER 7, 2009

12pm	Colleen Saidman
230pm	Urban Zen Integrative Therapist
330pm	Susan Bressman
6pm	Gabrielle Roth - 55 CPW



SUNDAY, NOVEMBER 8, 2009

	DEIDRE	RABBI STEPHEN
9am	DK (55 CPW)	11am DK (55 CPW)
11am	<i>MARCO PICK UP DEIDRE AT 55 CPW to take to SWS</i>	
12pm	Rodney (SWS)	12pm Jamie Naughtright (55 CPW) (<i>Jamie will come uptown</i>)
1pm	<i>MARCO PICK UP DEIDRE AT SWS to take to 55 CPW</i> <i>Ellen please have lunch ready for Deidre upon arrival at 55 CPW</i>	
130pm	Mara Landis (55 CPW)	130pm Annette Frehling (55 CPW)
245pm	Annette Frehling (55 CPW)	245pm Mara Landis (55 CPW)
4pm	OPEN	4pm Woody Merrell (55 CPW) (Tentative)
515pm	Woody Merrell (Tentative)	515pm OPEN
630pm	OPEN	630pm JJ Biasucci (55 CPW)
745pm	JJ Biasucci (55 CPW)	745pm OPEN

MONDAY, NOVEMBER 9, 2009

	DEIDRE	RABBI STEPHEN
930am	Ruth P (55 CPW)	1030am Ruth P (55 CPW)
12pm	Private Appt.	
115pm	OPEN	115pm OPEN
230pm	OPEN	230pm OPEN
4pm	OPEN	4pm Lisa Oz (55 CPW)
5pm -6pm	UZ STAFF SESSION w DEIDRE at SWS – Rachel, Joanne, Yonghee, Sonja (on phone) Ellen Hadley, Michelle Jean, Kevin Salyers, Annette Azan, Jamie (on phone) + Lisa Sunshine	
6pm-7pm	Dinner	
730pm - 9pm	UZ Radiance Healing Sessions – Women (Open to invited guests)	
9pm - 10pm	UZ Radiance Healing Sessions - Men + Women (Open to invited guests)	

TUESDAY, NOVEMBER 10, 2009

Rabbi + Eva leave on a Noon flight

DEIDRE
ALL DAY OPEN

WEDNESDAY, NOVEMBER 11, 2009

DEIDRE
MORNING IS OPEN ONLY

Wed, Jun 22, 2011 4:02 PM

Subject: Check out Deirdre Hade**Date:** Thursday, November 12, 2009 7:14 AM**From:** DB423@aol.com**To:** <rodney@yeeyoga.com>, <joanne@urbanzen.org>, <yoga@urbanzen.com>, <rb@warmspringsgroup.com>**Conversation:** Check out Deirdre HadeClick here: Deirdre Hade <<http://www.deirdrehade.com/>>

I saw this web site and I am a bit sick as she is taking full marketing (as well as financial) advantage of Donna, as is the Rabbi who told Aunt Gail that he is not a Rabbi much less a chiropractor. Yet, she has been letting him put on plastic gloves and put them in peoples' mouths to adjust their jaws. I also listened to Deirdre's "Sons of Asron" call Monday night and it was laughable.

If she were doing this on her own for herself, I really would not care too much as it is like her fun and who am I to question that. But, this is the kind of thing that can really damage UZ's reputation and diminish a huge amount of hard work by many, many people, which I am, myself, starting to appreciate, separate and apart from Donna's own efforts. So, please cogitate on this and let's talk among ourselves because I fear the Empress has no clothes and no one is telling her and, while it may be painful to hear, she should know. We are not her friends or supporters if we don't tell her. Otherwise, she will think it is just fine. She told me Woody showed up twice for healing with the Rabbi and I guess he is not going to tell her. I heard Mehmet Oz's wife was there. I hope she liked it or we may have lost some credibility with an important player. She is doing great with UZIT but she always has to go further and dilute her excellent work with stuff like this. I don't understand it exactly but know enough to realize it is not good for the program, or the budget. Any suggestions would be welcome. It is key that we confront her as a group, however, lest she say that one of us is just lacking the faith.

I am afraid that if we don't, next week it will be snake charmers or persons speaking in tongues or "Brain Fixers." It is her reputation and the program's integrity that are at stake and so I think, as painful as it is, we need to say something and suggest that this is not her alone any more and she needs to consult with us and take our views into account before just launching all out, non stop healing sessions with healers she has known only for a very short time and who might easily be never heard of again in a matter of weeks or months at the most. That has been the usual pattern.

David

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMIE A. NAUGHRIGHT,

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

10 Civ. 8451 (RWS) (HP)

- against -

DONNA KARAN WEISS, URBAN ZEN, LLC,
STEPHEN M. ROBBINS, and JOHN DOES 1-25

AFFIRMATION OF SERVICE

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

I, JAMIE ANN NAUGHRIGHT, declare under penalty of perjury that I have
(name)

served a copy of the attached AMENDED COMPLAINT
(document you are serving)

upon LAURA E. RODGERS and HOWARD S. RICHMAN whose address is _____
(name of person served)

lrodgers@gordon-silber.com and hrichman@grantrichman.com
(where you served document)

by Email delivery
(how you served document: For example - personal delivery, mail, overnight express, etc.)

Dated: Lakeland, FL
(town/city) (state)
December 3, 2011
(month) (day) (year)

Jamie A. Naughtright
Signature

1627 Sherwood Lakes Blvd.
Address

Lakeland, FL
City, State

33809
Zip Code

(863) 838-6035
Telephone Number